

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

**DECLARATION OF HILLARY B. STAKEM IN SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

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Liaison Counsel

Lead Counsel for Lead Plaintiff Los Angeles County Employees Retirement Association and Plaintiffs Amalgamated Bank, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers' Pension Fund

I, HILLARY B. STAKEM, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted *pro hac vice* before this Court. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, Lead Counsel of record for Lead Plaintiff Los Angeles County Employees Retirement Association, together with Plaintiffs Amalgamated Bank, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers' Pension Fund (collectively, "Plaintiffs") in the above-entitled action.¹ I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following exhibits:

- Exhibit A: Declaration of Esmeralda Del Bosque in Support of Plaintiffs' Motion for Class Certification, dated June 6, 2022;
- Exhibit B: Declaration of Mandy Tenner in Support of Plaintiffs' Motion for Class Certification, dated June 6, 2022;
- Exhibit C: Declaration of Brad Duff in Support of Plaintiffs' Motion for Class Certification, dated June 2, 2022;
- Exhibit D: Declaration of John Schmitt in Support of Plaintiffs' Motion for Class Certification, dated June 6, 2022;
- Exhibit E: Expert Report of W. Scott Dalrymple, CFA, dated June 6, 2022;
- Exhibit F: Expert Report of Cynthia L. Jones, CFA, dated June 6, 2022; and
- Exhibit G: Firm Resume of Robbins Geller Rudman & Dowd LLP.

¹ Amalgamated Bank, as Trustee for the LongView LargeCap 500 Index Fund, LongView Quantitative LargeCap Fund, LongView Broad Market 3000 Index Fund, LongView LargeCap 500 Index Fund VEBA, LV LargeCap 1000 Value Index Fund, LongView Quantitative MidCap Fund, LongView Quant LargeCap Equity VEBA Fund and LongView Core Plus Fixed Income Fund ("Amalgamated Bank").

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 6, 2022, at Penzance, England.

Hillary B Stakem

HILLARY B. STAKEM

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on June 6, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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